

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>09-</u>
v.	:	DATE FILED: <u>August</u> , 2009
NINA JONES	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy - 1 count)
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity theft - 8 counts)
	:	18 U.S.C. § 1030(a)(2)(A) (unauthorized access of record of financial institution - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 57282.
2. Defendant NINA JONES was employed as a teller for Citizens Bank at a branch located in Philadelphia, Pennsylvania, where she had access to the identity information of the bank's customers, including names, social security numbers, dates of birth, and account numbers, as well as account balance information.
3. From on or about October 21, 2005 to on or about March 2, 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

NINA JONES

conspired and agreed, with others known and unknown to the United States Attorney, to commit offenses against the United States, that is, to knowingly execute and attempt to execute a scheme to defraud Citizens Bank, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person, during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1), and (c)(5).

MANNER AND MEANS

4. Defendant NINA JONES and her co-conspirators used stolen identification information to cash fraudulent checks on victims' Citizens Bank accounts.

5. Defendant NINA JONES was recruited by Co-Conspirator 1, a person known to the United States Attorney, to provide and verify account information, including account numbers and account balances, of Citizens Bank account holders.

6. Defendant NINA JONES used her position at Citizens Bank to improperly access computerized information for Citizens Bank account holders, which information she provided to Co-Conspirator 1. The information provided to Co-Conspirator 1 included victim bank account information and balances.

7. Co-Conspirator 1 and other individuals involved in the scheme manufactured false photographic identifications in the name of those customers of Citizens Bank. The false identification contained the picture of individuals recruited to act as "check runners" for use in the cashing of fraudulent checks on the accounts of those Citizens Bank account holders.

8. Armed with false identification and fraudulent checks, these check-runners posed as Citizens Bank account holders to cash checks made payable to those customers, totaling more than approximately \$69,000.

OVERT ACTS

In furtherance of the conspiracy, defendant NINA JONES and her co-conspirators committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. From on or about October 21, 2005 to on or about January 19, 2006, defendant NINA JONES provided to, and verified for, Co-Conspirator 1 bank account information of approximately sixteen Citizens Bank account holders, including bank account numbers and account balances.

2. From on or about November 22, 2005 to on or about March 2, 2006, Co-Conspirator 1 and others used the account and personal information received from defendant NINA JONES to acquire and attempt to acquire approximately \$69,100 from Citizens Bank by presenting fraudulent identification in the name of the account holders to Citizens Bank tellers in order to cash fraudulent checks with Citizens Bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1, 2 and 4 through 8 and Overt Acts 1 and 2 of Count One are realleged here.

2. From on or about October 21, 2005 to on or about March 2, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

NINA JONES

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody and control of Citizens Bank by means of materially false and fraudulent pretenses, representations and promises.

THE SCHEME

3. From on or about October 1, 2005 to on or about March 2, 2006 defendant NINA JONES improperly acquired personal and account information for Citizens Bank accounts belonging to J.E., D.M., M.B., T.C., N.J., Ca.J., J.Y., N.W., E.B., Cr.J., S.F., C.M., LF., J.M., M.H., and K.S.

4. Defendant NINA JONES then provided that personal and account information to Co-conspirator 1, who, with others, used that information to fraudulently take and attempt to take approximately \$69,100 from Citizens Bank by cashing fraudulent checks on accounts belonging to J.E., D.M., M.B., T.C., N.J., Ca.J., J.Y., N.W., E.B., Cr.J., S.F., C.M., LF., J.M., M.H., and K.S.

5. In furtherance of the scheme, other individuals cashed or attempted to cash the following counterfeit checks, or made or attempted to make the following fraudulent withdrawals:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
11/22/05	Glenside, PA	J.E.	\$1,900 attempt
11/28/05	Philadelphia, PA	D.M.	\$1,500
11/29/05	Philadelphia, PA	D.M.	\$1,850 attempt
12/20/05	Warrington , PA	M.B.	\$1,700 attempt
12/20/05	Warminster, PA	M.B.	\$1,900
12/21/05	Davisville, PA	M.B.	\$1,800 attempt
12/20/05	Willow Grove, PA	T.C.	\$1,900
12/21/05	Conshohocken, PA	T.C.	\$1,500
12/21/05	Andorra, PA	T.C.	\$1,900 attempt
01/03/06	Jenkintown, PA	N.W.	\$1,500 attempt
01/07/06	Willow Grove, PA	N.J.	\$1,800 attempt
01/07/06	Philadelphia, PA	Ca.J.	\$2,000 attempt
01/08/06	Philadelphia, PA	Cr.J.	\$1,900
01/09/06	Philadelphia, PA	B.M.	\$2,000
01/11/06	Langhorne, PA	E.B.	\$2,000 attempt
01/11/06	Philadelphia, PA	B.M.	\$2,000
01/11/06	Levittown, PA	K.S.	\$1,800
01/13/06	Levittown, PA	K.S.	\$2,000
01/13/06	Philadelphia, PA	B.M.	\$1,900
01/13/06	Philadelphia, PA	B.M.	\$1,400
01/17/06	Philadelphia, PA	B.M.	\$1,000

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT</u>
01/17/06	Philadelphia, PA	J.Y.	\$1,800
01/17/06	Philadelphia, PA	J.Y.	\$1,500
01/17/06	Philadelphia, PA	S.F.	\$1,800
01/17/06	Philadelphia, PA	S.F.	\$1,900 attempt
01/17/06	Cedarbrook, PA	S.F.	\$250
01/18//06	Philadelphia, PA	J.Y.	\$1,800
01/19/06	Philadelphia, PA	J.Y.	\$1,800 attempt
01/19/06	Philadelphia, PA	J.Y.	\$1,800
01/19/06	Philadelphia, PA	J.Y.	\$1,500
01/20/06	Philadelphia, PA	J.Y.	\$1,800 attempt
01/21/06	Philadelphia, PA	L.F.	\$1,900
01/22/06	Philadelphia, PA	L.F.	\$1,800
01/23/06	Philadelphia, PA	L.F.	\$2,800
01/24/06	Philadelphia, PA	L.F.	\$2,500
01/25/06	Philadelphia, PA	L.F.	\$2,200
01/25/06	Philadelphia, PA	L.F.	\$2,800
02/15/06	Philadelphia, PA	M.H.	\$1,900 attempt
03/02/06	Philadelphia, PA	J.M.	\$2,000 attempt

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS THREE THROUGH TEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

NINA JONES

knowingly and without lawful authority, transferred, possessed and used, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, the account number and account information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>
3	11/28/05	D.M.
4	12/20/05	M.B.
5	12/20/05	T.C.
6	01/17/06	J.Y.
7	01/17/06	S.F.
8	01/09/06	B.M.
9	01/21/06	L.F.
10	01/11/06	E.B.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT ELEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about November 1, 2005 to on or about March 2, 2006, in the Eastern District of Pennsylvania, defendant

NINA JONES

intentionally accessed a protected computer and exceeded authorized access, and thereby obtained information contained in a financial record of a financial institution, that is, Citizens Bank.

In violation of Title 18, United States Code, Section 1030(a)(2)(A).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1344, set forth in this information, defendant

NINA JONES

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this information, including, but not limited to, the sum of \$46,950.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

MICHAEL L. LEVY
United States Attorney
